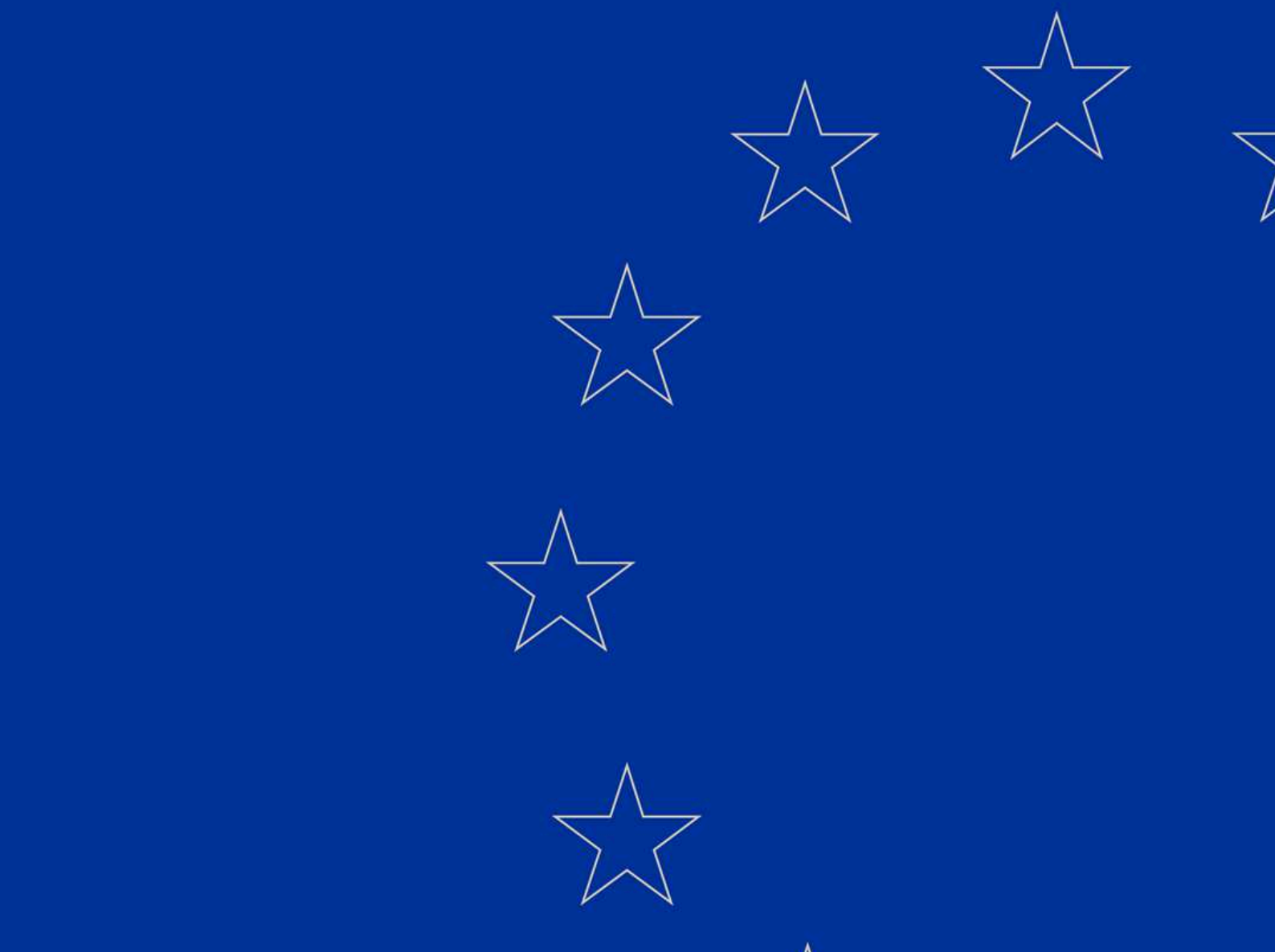
European Commission

# Digital Product Passport: Frequently Asked Questions (FAQ)



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**EUROPEAN COMMISSION**

Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs
Directorate G — Compliance and Responsible Business Conduct
Unit G2 — Single Market Implementation Tools

*European Commission*
*B-1049 Brussels*

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*Version 1.0*

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This set of Frequently Asked Questions (FAQs) is designed to assist stakeholders in the implementation of the legal provisions.

The FAQs are the product of extensive stakeholder interactions, and this is intended to be a ‘living document’ that will be updated as and when necessary.

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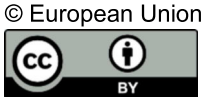

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# General

### Scope of this FAQ

**This FAQ focuses on the general DPP system and requirements outlined in the Regulation (EU) 2024/1781 establishing a framework for the setting of ecodesign requirements for sustainable products (referred to as the 'Ecodesign Regulation'), DPP requirements introduced outside of this framework (i.e. Batteries Regulation or other) will not be covered in this FAQ.**

For context, the legal basis for the DPP is the Ecodesign Regulation ([1]). The specific DPP requirements for a product are defined in one of two ways: either through product-specific 'delegated acts' adopted under the Ecodesign Regulation, or through separate, standalone EU legislation (such as Batteries Regulation ([2]), Toys Safety Regulation ([3]), Construction Products Regulation ([4]) etc.).

**This FAQ focuses exclusively on the DPP's general framework and common requirements as defined by the Ecodesign Regulation**.

However, it is essential to note that **all DPPs, regardless of their legal origin, will use the same underlying technical system defined by the Ecodesign Regulation.** This framework ensures consistency and interoperability across the entire DPP ecosystem. For example, a DPP may initially only contain a declaration of conformity, as required under the sectoral legislation. Once DPP requirements for a specific product group become mandatory under a delegated act from the Ecodesign Regulation, the same DPP will be updated to include those additional requirements, such as information related to ecodesign.

For information purposes other key legislation outside of the ecodesign framework also introduce DPP requirements.

Below you find an indicative list, however, it is important to note that this Q&A document does not look into their specific rules.

([1]) (EU) 2024/1781 of the European Parliament and of the Council establishing a framework for the setting of ecodesign requirements for sustainable products

([2]) (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries

([3]) (EU) 2025/2509 of the European Parliament and of the Council on the safety of toys

([4]) (EU) No 2024/3110 of the European Parliament and of the Council of 27 November 2024 laying down harmonised rules for the marketing of construction products



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This table was last updated in **January 2026**:

| Legislation | Purpose | Timeline & Status |
|---|---|---|
| Batteries Regulation | Sets sustainability, safety, and recycling standards for batteries. | **Adopted.** The first DPPs will be mandatory for certain large batteries from early 2027. |
| Construction Products Regulation | Ensures construction products meet essential safety and performance standards. | **Adopted.** Regulation applies from Jan 2026. DPPs required 18 months after a future delegated act. |
| European Critical Raw Materials Act | Secures the supply of critical raw materials for EU industry. | **Adopted.** DPP information required ~late 2028 (2 years after a future implementing act). |
| Packaging and Packaging Waste Regulation (PPWR) | Regulates packaging to minimise waste and environmental harm. | **Adopted.** Labelling/data requirements apply from August 2028 or later, pending an implementing act. |
| Toy Safety Regulation | Ensures toys meet strict safety standards to protect children. | **Adopted.** Regulation applies from 1 August 2030, with provisions on DPP delegated powers applying from 1 January 2026. |
| Detergents & Surfactants Regulation | Sets requirements for the composition and labelling of detergents. | **Adopted.** Political deal reached. Awaiting signature of act. Final timeline details on DPP obligations are expected in early 2026. |



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## 1. What is a Digital Product Passport (DPP)?

Digital Product Passport (DPP) is a digital identity card for products, components, and materials, which will store relevant information to support products' sustainability, promote their circularity and strengthen legal compliance.

All DPP's will be designed to be interoperable with each other. They can be accessed by scanning a data carrier (such as a QR code or similar technology, depending on the product characteristics) placed on the product, its packaging, or the documents accompanying the product. This provides transparent and reliable data to all relevant actors: consumers, businesses and authorities.

The specific data that a DPP must contain is determined by 'delegated acts' adopted under the Ecodesign Regulation or by separate product-specific legislation as DPPs are being progressively integrated into other legislation across sectors (such as for toys, detergents, construction products etc.). The latter is not covered by this FAQ.

For a more in-depth exploration of the Ecodesign for Sustainable Products Regulation and the integration and extension of the DPP beyond these mandates, please visit the following links:

- Implementing the Ecodesign for Sustainable Products Regulation
- DPP Newsletter

## 2. What is the purpose of the DPP?

The DPP supports products' sustainability, helps to promote products' circularity and strengthen legal compliance.

Acting as a horizontal aggregator or a 'container', various product-related information can be stored within the DPP. This includes but is not limited to sustainability, life-cycle data and compliance information. This information can be accessed electronically, making it easier for everyone, including consumers, manufacturers, and recyclers to make more informed decisions related to sustainability, circularity and regulatory compliance.

DPP will allow custom authorities to perform automatic checks on the existence and authenticity of the DPPs of imported products, as well as improve the efficiency and effectiveness of market surveillance checks inside the internal market.

## 3. How will the DPP work in practice for each stakeholder?

The DPP facilitates access to specific information for various stakeholders throughout a product's lifecycle. It can be accessed by scanning a data carrier, allowing stakeholders to retrieve relevant data. Alternative options will also exist,


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including searching for the DPP through the web-portal *(please see question 19 for further information on the topic)*. The following sections below outline the practical application of the DPP for each key stakeholder group, as per the Ecodesign Regulation.

*1. For the Economic Operator:*

*The economic operators include the manufacturer, the authorised representative, the importer, the distributor, the dealer and the fulfilment service provider.*

The primary responsibility for the DPP's creation and accuracy rests with the economic operators placing the product on the EU market. They are responsible for:

- Data Compilation: The economic operator shall provide the product data digitally, following the data structure and obligations as specified in the relevant legislation. This information forms the content of the DPP.
- Registration: The DPP shall be registered in the EU DPP Registry in accordance with the relevant technical specification and requirements of the specific delegated act. This includes product-specific data if defined to be included in the delegated act.
- Market Access: This registration is mandatory for placing the product on the single market. The economic operator must also ensure that a physical data carrier is attached to the product, its packaging or on the documentation accompanying the product (as determined in the product specific legislation).
- Lifecycle Management: The economic operator is tasked with maintaining data accuracy throughout the product’s lifecycle.

*2. For the Consumer*

The DPP provides consumers with transparent and verifiable product information at the point of sale and beyond.

- Pre-Purchase Information: By scanning the data carrier with a smartphone or other personal electronic devices, consumers can access key information about the product. This facilitates direct comparison through the web portal *(please see question 19 for further information)* and supports informed purchasing decisions.

- Post-Purchase Support: The DPP serves as a digital repository for various information. This can potentially include user manuals, maintenance guides, and end-of-life instructions.


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*3. For Public Authorities (Customs & Market Surveillance)*

For public authorities, the DPP is an essential tool for streamlined and effective regulatory enforcement.

- Customs Controls: At the point of entry into the EU, customs authorities can electronically search the DPP Registry to verify that a DPP for the product has been registered in the registry. This will enable the automated screening of imports and help prevent non-compliant goods from entering the EU market ([5]).

- Market Surveillance: Market Surveillance Authorities (MSAs) can scan a product's data carrier to access its documentation and conduct targeted searches for non-compliant products. In addition, the DPP Registry will facilitate access to the DPPs for MSAs.

*4. For Repairers, Refurbishers, and Recyclers*

The DPP is essential for enabling a true circular economy by providing detailed technical information to these operators.

- Professional Repairers & Refurbishers: By scanning the data carrier or searching for specific product categories, they could for example access (if those data points are required by the product-specific delegated act):
    - detailed disassembly instructions;
    - a list of compatible spare parts and tools required for repairs;
    - diagnostic information to identify faults.

  This makes repairs easier, more reliable, and more cost-effective.
- Recyclers: The DPP could for example provide information on the product’s material composition (if those data points are required by the product-specific delegated act). Recyclers could identify quantities and types of valuable materials (e.g. critical raw materials) for recovery and know which components contain substances of concern that must be safely removed.

([5]) The interconnection enabling this automated verification by customs is scheduled to be operational within four years of the relevant implementing act's entry into force, as per Article 15(3) of the ESPR.



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## 4. What are the milestones for the DPP technical implementation?

The implementation of the DPP depends on several aspects, including the development of the technical system, and the underpinning standards. The European Commission is working on the timely rollout of the DPP across product categories with several important milestones on the horizon.

The DPP Registry, which has a legal deadline to be operational as of **19 July 2026**. This registry will function as the central indexing system for all DPPs, linking each product's unique identifier to the decentralised location of its data. It will then be linked to the EU customs system to enable automated information exchange with national customs authorities. This interconnection must be operational within four years after the rules establishing the DPP registry enter into force.

A DPP web portal is planned for launch in the coming years. This portal will serve as a central public interface, allowing consumers and other interested parties to look up and compare product information contained within the DPP. To ensure that the DPP system is secure and interoperable across the EU, European standardisation organisations are developing eight core technical standards. This work, undertaken by the CEN-CENELEC Joint Technical Committee 24 (JTC 24), will result in European standards covering the essential requirements for the technical design and operation of the DPP. Please *see question 21* for further details on the standardisation. The eight DPP standards are expected to be finalised and published by **mid-2026**.

## 5. What is the timeline for different products to implement the DPP?

The DPP will be introduced progressively, product by product, in line with ecodesign requirements under the **Ecodesign Regulation following the ESPR Working Plan**. The first Working Plan, published in **April 2025**, sets out the first priority product categories for regulation and provides an indicative schedule for the adoption of specific, legally binding rules (delegated acts) for different product categories.

The plan outlines separate timelines for bringing new product groups under regulation and for updating the existing rules for energy-related products. It identifies priority product groups for ecodesign requirements, including the use of DPP, covers a multi-year period (currently five years) and is updated regularly to include new product categories.

**Crucially, inclusion of a product group in the Working Plan does not automatically mean that the use of a DPP among these products is mandatory.** It signifies that a product group is scheduled for an **in-depth study and impact assessment**. This evaluation process will determine:



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1. What specific ecodesign requirements are appropriate for that product, if any.
2. Whether a DPP is the most suitable tool for providing information.
3. The final, legally binding compliance date.

The first ESPR Working Plan sets out the following indicative timeline for when the Commission aims to **complete this evaluation and adopt the final rules**:

- **2026** – Iron and steel
- **2026–2029** – Energy-related products
- **2027** – Textiles, tyres, and aluminium
- **2028** – Furniture
- **2029** – Mattresses and ICT products

## 6. To which products do the DPP apply, and what are the exemptions?

Under the Ecodesign Regulation, there is **no general obligation** for a product to have a DPP. Instead, its introduction is a gradual, product-by-product process managed through product-specific rules (delegated acts). The ESPR Working Plan lists the priority product groups that will be considered for these rules.

**Exemptions under the Ecodesign Regulation framework**

The Ecodesign Regulation framework includes two main types of exemptions:

1. **Categorical Exclusions:** The Ecodesign Regulation itself does not apply to certain product categories, which will therefore not have a DPP under this framework. These include:
    - Food and animal feed
    - Medicinal products for human or veterinary use
    - Living plants, animals, and microorganisms
    - Products of human origin
2. **Exemptions to Avoid Duplication:** The Commission may grant an exemption for a product group if another EU law already provides a digital information system that achieves the same goals. This is to avoid creating redundant systems.


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## A note on sector-specific legislation

It is important to note that, separate from the Ecodesign Regulation framework, some products will have a DPP mandated by their own dedicated EU legislation. Therefore, businesses must always consult the specific EU legislation applicable to their product category to determine if a DPP is required.



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# Legislation

## 7. What is the relation and purpose of the Delegated Acts setting ecodesign requirements, to the DPP?

While the Ecodesign Regulation provides the legal basis for the DPP, the delegated acts setting ecodesign requirements (Chapter II of the Ecodesign Regulation) will also define how the DPP works for these products:

The delegated acts serve several key purposes:

- **They specify which products need a DPP:** Delegated acts will identify the exact product categories that must have a DPP.
- **They define the required information:** For each product group, a dedicated delegated act will outline precisely what information its DPP must contain, ensuring the requirements are relevant and practical.

**They ensure proper scrutiny:** Before adopting delegated acts setting ecodesign requirements, the Commission has committed to draw up a dedicated impact assessment and stakeholder consultation, in line with the Commission's Better Regulation guidelines. The Commission will consult stakeholders and experts by each Member State acting in accordance with the principles laid down in the Interinstitutional Agreement on Better Law-Making ([6]). Both the European Parliament and the Council can express objections to the delegated acts.

([6]) Document 32016Q0512(01) on Interinstitutional Agreement between the European Parliament, the Council of the European Union and the European Commission on Better Law-Making



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# Industry

## 8. How will the Digital Product Passport impact day-to-day business operations?

Essentially, the DPP serves as a digital repository that will contain information about a product.

Initially, small and medium-sized enterprises (SMEs) may need technology upgrades and training to meet the DPP requirements. However, the DPP also presents an opportunity for SMEs to demonstrate transparency in terms of sustainability and quality of their products, which can lead to new market opportunities and stronger relationships with customers who value these aspects. Furthermore, the DPP will facilitate reporting to authorities by providing reusable machine-readable data in standardised formats.

To ease the technical burden on businesses, the DPP framework allows for specialist **DPP service providers**. These are independent companies that will offer the data hosting and management services needed to host a DPP. For many businesses this will be a straightforward way to ensure compliance, as these providers will handle all technical requirements, including the legally mandated data back-ups, for them.

The Commission is aware of the challenges the DPP may pose to businesses and is actively working on developing tools that will support particularly SMEs in navigating the new requirements. Please see *question 10* for more details.

## 9. What are the benefits for the industry?

The DPP offers real business benefits by helping companies improve their supply chain and market position, increase efficiency and compliance, create new opportunities in the circular economy, and increase transparency and traceability.

1. *A Stronger Market Position*

The DPP enables companies to prove the quality and sustainability of their products with data. Instead of competing only on price, businesses can use verifiable information on durability, repairability, and environmental impact to stand out from competitors. This transparency builds consumer trust and strengthens brand reputation by backing up green claims with clear, accessible facts. Additionally, it encourages innovation in sustainable product design, digital solutions, and material management. Early adopters can gain a competitive advantage as sustainability information becomes a market differentiator.

2. *Improved Efficiency and Simpler Compliance*

The DPP simplifies compliance and makes business operations more efficient. It provides the opportunity to digitalise necessary compliance documents, like



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certificates and declarations. This in turn, reduces administrative work and makes it easier to interact with authorities. The standardised data also improves information sharing with suppliers and distributors, helping to prevent errors and make the entire supply chain run more smoothly.

3. *New Opportunities in the Circular Economy*

The DPP creates new revenue streams and makes circular business models more profitable. It may provide detailed technical information that makes professional repair, refurbishment, and high-quality recycling easier, more cost-effective and creates new opportunities in this field. This helps grow the market for secondary goods and materials.

4. *Increased Transparency and Traceability*

By providing reliable machine-readable data, companies can track materials across the value chain and enhance transparency, from production to end-of-life. This increased visibility strengthens supply chain transparency, accountability, and compliance, while also helping businesses identify opportunities to improve resource efficiency and reduce environmental impact.

## 10. I am an SME – what support can I get for implementing the DPP?

The Ecodesign Regulation *(under Article 22)* recognises the vital role of SMEs and contains specific provisions to support them. This support is planned at both the European and national levels to alleviate regulatory pressure and help SMEs benefit from the DPP.

**Support from the European Commission:** The Commission will provide resources that help to facilitate compliance. When new DPP rules are adopted for a product, these will be accompanied, where appropriate, by:

- **Targeted guidelines** covering the specific needs of SMEs.
- **Freely accessible digital tools** to assist with implementation.

**Support from your Member State:** Each Member State is required to consult with SME organisations and take appropriate measures to provide support. This will include:

- **Mandatory 'one-stop shops'** or similar mechanisms to raise awareness and create networking opportunities.
- The possibility of additional support (in line with state aid rules) such as **financial assistance** (e.g., fiscal advantages), **specialised training**, and **organisational or technical assistance**.

**Have Your Say:** It is crucial to remember that before a DPP becomes mandatory for any product, the Commission must conduct public consultations and an impact assessment. This process specifically considers the effects on SMEs, providing



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a direct opportunity for businesses to contribute (also via your business associations) ensuring that their needs and concerns are addressed.

## 11. At what stage of the supply chain does the DPP become applicable?

The DPP must be active and registered when a product is placed on the EU market, i.e. first made available on the EU market. This rule applies to both:

- **EU-manufactured products**: before they are first sold or distributed within the EU.
- **Imported products**: before they can be released for free circulation by customs authorities at the EU external borders.

Depending on whether the product is manufactured in the EU or outside, the manufacturer, the authorised representative, the importer, the distributor, the dealer or the fulfilment service provider are responsible to create the DPP and ensure its unique identifiers are registered in the DPP Registry.

The purpose of the DPP is to provide essential information - public and restricted - to all actors who have the right for that information, throughout the product's lifecycle, from design to distribution and repair to recycling.



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# Consumers

## 12. What are the benefits for consumers?

The DPP empowers consumers by providing transparent and reliable information. It will be possible to see (if those data points are required by a product-specific delegated act), for example, what a product is made of, its durability, its environmental impact, and how to repair it, helping to make more sustainable choices and extend the product's life. Moreover, comparisons between products will be facilitated by having searchable standardised data in fixed formats.

## 13. What kind of information will I find in the DPP as a consumer?

The DPP will provide consumers with transparent product information to support more informed and sustainable purchasing decisions. The specific data contained in the DPP will be defined on a product-by-product basis through product-specific delegated acts under the Ecodesign Regulation. This information may include:

- **Circularity Information:** Details on durability, reparability, and recyclability.
- **Product Composition:** Information on the materials and components used.
- **Usage and Maintenance:** Access to user manuals, repair instructions, and details on the availability of spare parts to extend the product's lifespan.
- **End-of-Life Guidance:** Instructions on disassembly, reuse, or recycling to promote circularity.

This information could be complemented by information required by other relevant legislation, such as documentation confirming compliance with applicable EU legislation and key insights into the product's supply chain.

## 14. How can consumers access the DPP?

The Ecodesign Regulation requires free of charge and easy access to the DPP, ensuring consumers have the information needed to make a purchase. Consumers can access DPP information in several ways:

- **Scanning the data carrier:** The easiest way for consumers to access the DPP will be by scanning the data carrier (for example a QR code) placed on the product or its packaging/documentation accompanying the product.
- **Through the EU Web Portal:** A dedicated public web portal will be launched, acting as a central search engine where consumers can look up and compare information for different products.



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- **When Shopping Online:** Online marketplaces will be required to make the DPP easily accessible on the product page, allowing consumers to review its details before making a purchase.

## 15. What if a consumer does not own a smartphone?

DPPs might not only be accessed with a smartphone but also different devices. Consumers doing online shopping on a laptop might prefer opening the DPP on the laptop instead of a smartphone. This remains an alternative to scanning the data carriers via a smartphone.

Additionally, some stores may offer devices or kiosks in-store that allow customers to access the DPP. For example, many modern retail stores provide interactive kiosks or tablets where customers can scan QR codes or other data carriers, and access product information digitally. Typically, these devices are user-friendly and designed to help shoppers easily access information. Also, store staff are often available to assist customers in accessing digital product information.

Some retailers may offer scanning services at customer service desks, where assistance can be requested in accessing a product's DPP. While the availability of such options may vary depending on the store and its digital infrastructure, it is becoming increasingly common as digital and smart technologies are integrated into shopping experiences. Lastly, some information will be available as a printed paper copy, upon request.

## 16. What are the privacy considerations of using the DPP?

The DPP is designed with privacy and data protection in mind, focusing on product information rather than personal data. The Ecodesign Regulation embeds several key safeguards in line with the General Data Protection Regulation (GDPR), including:

- **'Privacy by Design' as a Core Principle:** The system is built on the principle of "data protection by design and by default", ensuring that general access to product information is anonymous, without a need of identification.
- **No Personal Data by Default:** The Ecodesign Regulation explicitly states that personal customer data shall not be stored in the DPP.
- **Explicit Consent as the Only Exception:** The only circumstance in which personal data could be linked to a DPP is if an individual provides their explicit, informed consent for a specific, clearly stated purpose, in full compliance with the GDPR.


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## 17. What rights do I have as a consumer related to the DPP?

Consumers have the right to access the information contained in the DPP, whether in-store or online. This enables them to make informed decisions by comparing product attributes such as environmental impact or materials used. Consumers can expect accurate and up-to-date information, maintained by manufacturers, ensuring transparency and compliance with relevant regulations.



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# Technical and DPP implementation

## 18. How do the DPP Registry and Web Portal work?

To manage the DPP system, the European Commission will launch two platforms. The **DPP Registry** will function as a secure database, storing the unique identifiers for each product. The **DPP Web Portal** will serve as a public website, allowing consumers, businesses, and authorities to easily compare and search for product information. By integrating these systems with customs and market surveillance operations, this framework ensures transparent access to information while facilitating EU-wide enforcement.

## 19. Is the DPP a centralised or decentralised tool?

The architecture of the DPP combines both centralised and decentralised elements.

- A **DPP registry** will be established at the EU level. This registry will not store the detailed product data itself; instead, it will link each product's unique identifier to the location of the DPP. Delegated acts under the Ecodesign Regulation for product-groups may specify additional information that will need to be stored in the registry which will be specified accordingly in the legislation.
- The detailed product data is stored in a **decentralised** manner, hosted by the individual economic operators or by service providers on their behalf.

This hybrid structure ensures that while data is managed and controlled by individual operators, it remains consistently and reliably accessible to consumers, other economic operators down the value chain, market surveillance authorities and any other authorised parties through a single, regulated entry point.

## 20. What are the 8 harmonised standards applicable to the DPP?

To advance technical harmonisation and ensure the DPP system is secure and interoperable, the European Commission has issued a standardisation request ([7]) to the European Standardisation Organisations (ESOs): the European Committee for Standardisation (CEN), the European Committee for Electrotechnical Standardisation (CENELEC), and the European Telecommunications Standards Institute (ETSI).

This work, undertaken by the CEN-CENELEC committee JTC 24, will result in European standards covering the essential requirements for the technical design and operation of the DPP. These standards cover the following core areas:

([7]) Commission Implementing Decision C (2024) 5423 final of 31.7.2024 on a standardisation request as regards digital product passports.



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- **Unique identifiers** for products, economic operators, and facilities.
- **Data carriers** and the link between the physical product and its digital representation.
- **Access rights management**, information security, and data protection.
- **Interoperability requirements** (technical, semantic, and organisational).
- **Data processing**, data exchange protocols, and data formats.
- **Data storage, archiving, and persistence** to ensure long-term availability.
- **Mechanisms for data authentication, reliability, and integrity**.
- **Application Programming Interfaces (APIs)** for the DPP lifecycle management.

These new European standards will build upon existing international and European standards, ensuring efficiency, global interoperability, and proven technical solutions. More information, including the list of standards, can be found here.

## 21. How does the Commission guarantee the interoperability of the DPP?

Interoperability is an essential requirement, ensuring that DPPs can be easily shared and used across different systems, platforms, and sectors. It is secured primarily through the standardisation request ([8]), which mandates the development of standards that establish a common technical framework.

This framework ensures interoperability by requiring that the standards:

- Build upon the **European Interoperability Framework**, considering related assets such as core vocabularies, base registries, and application profiles.
- Allow for **interoperability with existing legacy identification systems** where possible.
- Facilitate an **open, interoperable data exchange network** to prevent vendor lock-in.
- Ensure **interoperable extendibility**, allowing for additional data types or records to be integrated in the future.

([8]) Commission Implementing Decision C(2024) 5423 final of 31.7.2024 on a standardisation request as regards digital product passports.



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By mandating that the new European standards incorporate these principles, the Commission aims to create a cohesive and functioning DPP ecosystem.

## 22. Would the DPP allow the inclusion of voluntary data points?

Yes, additional voluntary data points may be incorporated, provided that data accuracy, interoperability, or the passport's functionality is not compromised. In addition, the voluntary data points must be clearly distinguished from the mandatory data points.

## 23. How will stakeholders be consulted on the technical DPP system and on the DPP data for the different products, and how can they contribute?

Stakeholders are consulted on the DPP system and product-specific data under the Ecodesign Regulation through structured mechanisms:

- Regular exchanges with stakeholder groups via Ecodesign Forum;
- Public calls for evidence, including the recent consultation on DPP service provider requirements; but also through public consultations for the delegated acts setting ecodesign requirements *(Article 4 of the Ecodesign Regulation)*;
- Targeted surveys and focus groups for technical specifications, and a functional mailbox for direct queries.

## 24. How will the Commission ensure that the decentralised approach for DPP data storage does not lead to inconsistencies in data access and quality across different Member States?

The Ecodesign Regulation establishes mechanisms to ensure consistency, data quality, and long-term availability within the decentralised system:

- **Harmonised Data Requirements:** Economic operators manage their own data, but they must comply with common standards. Specific EU regulations ('delegated acts') will set out the exact data that each DPP must contain for each product group. This approach ensures comparability of DPPs across similar product types.
- **Unique Identifiers:** Each product (whether at the model, batch, or item level) is linked via a data carrier to a single, globally unique product identifier. This identifier connects to the product's one official DPP, preventing the creation of duplicate or conflicting information.
- **Mandatory Data Back-up and Availability:** To ensure data longevity, the Ecodesign Regulation mandates that the economic operator must provide a backup copy of the DPP through a third-party service provider *(Article*


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*10(4))* ([9]). This requirement secures the DPP's availability throughout product's expected lifetime, even if the original economic operator faces insolvency, liquidation, or ceases operations *(Article 11(e))* ([10]).

- **Information quality and enforcement:** Information requirements are already established under the existing Ecodesign Regulation and Energy Labelling legislation and are enforced by market surveillance authorities across Member States. These existing enforcement practices provide a strong foundation for ensure data accuracy and reliability and will continue to apply as DPP requirements are gradually introduced.

## 25. Will there be an obligation for third party certification or conformity assessment on the information disclosed in the DPP?

At present, there is no universal requirement for third-party certification or conformity assessment of DPP information. However, in the coming years, the Commission plans to propose specific requirements for product groups based on the ESPR working plan, which might, in certain cases, require accredited third-party certification for specific data points, if deemed necessary by the in-depth study and impact assessment.

## 26. Is there any certainty around the data carrier for the DPP? Would a QR code be sufficient? Are NFC chips considered?

The data carrier for the DPP will be specified in the delegated act for each product group, ensuring it is tailored to meet the product's requirements. CEN-CENELEC JTC 24 is currently developing standards for data carriers and is tasked to assess the suitability of different technologies. Common options like QR codes and NFC chips are being considered as part of this assessment, which will also weigh factors such as the product's nature (amongst other elements), ensuring a practical and sustainable solution for a data carrier is chosen.

## 27. Should information on substances of concern contained in a product be included in the product's DPP? Should hazardous substances and their mixtures also have DPPs in addition to the labelling required under the CLP Regulation?

The information on substances of concern present in a product will be included in the DPP if a DPP is required for the product. Specific thresholds and exemptions will be detailed in the product-specific delegated acts, based on the

([9]) (EU) 2024/1781 of the European Parliament and of the Council establishing a framework for the setting of ecodesign requirements for sustainable products

([10]) (EU) 2024/1781 of the European Parliament and of the Council establishing a framework for the setting of ecodesign requirements for sustainable products



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results of the in-depth preparatory study and impact assessment. Substances and mixtures themselves are not obliged to have a DPP, unless another Union legislation mandates otherwise, or unless such substances and mixtures are regulated under the Ecodesign Regulation.



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# Trade

## 28. Does the DPP pose an unnecessary barrier to trade?

The DPP adheres to WTO rules, as its requirements are applied in a non-discriminatory, proportionate, and transparent manner. The DPP aims to enhance transparency and product origin information, while simplifying and digitalising information exchange across value chains. It also seeks to improve circularity and empower consumers to make more informed purchasing decisions. In the long term, the DPP has the potential to facilitate trade by promoting harmonized product data standards and increase transparency and accountability across global supply chains.

## 29. Is the DPP applicable to countries outside of the EU? Will products from outside of the EU need a digital product passport? What obligations will online marketplaces from outside of the EU have in this respect?

Yes, the DPP is mandatory for all products imported into the EU market if a product-specific delegated act under the Ecodesign Regulation requires a product to have a DPP. The economic operator responsible for placing these products on the EU market must ensure the presence of the DPP.

Online marketplaces will need to make DPPs accessible if they sell their products in the EU. Market surveillance authorities will monitor online marketplaces to identify non-compliant products sold online. Failure to comply with the DPP requirements may lead to penalties or the removal of non-compliant products from the EU market.



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# Compliance and enforcement

## 30. Who will be responsible for enforcing the DPP?

**Competent National Authorities:** Member States are responsible for implementing and enforcing the regulation within their territories.

a. Market Surveillance Authorities in the Member States conduct product compliance checks, and national measures can be applied to mitigate risks from certain products. Additionally, Member States are tasked with setting penalties for regulation infringements and overseeing the assessment and monitoring of conformity assessment bodies.
b. Customs authorities are crucial in enforcing controls at the EU external borders to ensure products have a corresponding DPP before being released for free circulation.

**Consumers:** Consumers have the right to claim compensation for damages caused by non-compliant products, adding a layer of private enforcement. They can claim compensation from the product's manufacturer or, if the manufacturer is not established in the Union, the importer or authorised representative. If none of these economic operators are established in the Union, the fulfilment service provider may be liable.

## 31. Are there plans to monitor the digital product passports centrally to ensure that the Regulation is complied with and that there are no duplicate product passports? How will the Commission verify the accuracy and reliability of the data entered by manufacturers?

The verification of the DPPs will be managed through a structured, multi-layered approach, with distinct roles for different authorities. The primary responsibility for verifying the accuracy, completeness, and reliability of the data within a DPP lies with the Market Surveillance Authorities in each Member State, who will perform checks as part of their standard enforcement duties.

At the EU border, a central DPP registry will allow Customs Authorities to perform an initial, automated check to verify that a product has a valid, unique registration identifier before it is released for free circulation, thereby preventing duplicates and ensuring a DPP exists. ([11])

Accountability is also fostered through other legal mechanisms:

([11]) It must be noted that the connection with customs must be built 4 years within the launch of the DPP Registry. Therefore, it is expected around 2029.



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- Manufacturers are obliged to provide channels for consumer complaints *(Article 27(9))* ([12]),
- Consumers have the right to claim compensation for damages suffered due to a product's non-compliance *(Article 76)* ([13]).

Together, these measures create strong incentives for manufacturers to ensure data accuracy. This combination of official oversight and legal accountability is designed to maintain the integrity of the DPP system.

## 32. What penalties will be imposed on manufacturers who fail to maintain accurate and up-to-date DPP information? Are penalties also imposed on other economic operators who do not comply with DPP related obligations set out by the Regulation?

Penalties are determined by Member States. As specified in *Article 74* of the Ecodesign Regulation they must be 'effective, proportionate and dissuasive'. They will apply not only to the manufacturers who do not comply with their obligations but also to other economic operators or stakeholders, such as online platforms.

([12]) (EU) 2024/1781 of the European Parliament and of the Council establishing a framework for the setting of ecodesign requirements for sustainable products

([13]) (EU) 2024/1781 of the European Parliament and of the Council establishing a framework for the setting of ecodesign requirements for sustainable products



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# Examples of existing workstreams looking into the future DPP implementation

CIRPASS-2, an Innovation Action project funded by the European Commission's Digital Europe Programme, running from May 2024 to April 2027, supports 13 pilot projects aimed at testing DPPs across four key value chains: textiles, electrical and electronic equipment, construction products, and tyres. CIRPASS-2 also demonstrates the interoperability of the DPP Information System across different pilots and verifies the feasibility of large-scale DPP issuance, management, and use throughout extended circular value chains and product life cycles. Together, these pilots underscore the DPP’s potential as a driving force in the circular data economy transition, an essential component of the EU's green transition. Further examples can be found on this **website**.


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